

EXHIBIT 111

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MINNESOTA

3 CIVIL NO. 18-1776 (JRT/HB)

4
5 _____
6 IN RE: PORK ANTITRUST LITIGATION

7 This document relates to:

8 All Actions

9 _____/

10 January 27, 2022

11 10 a.m. - 3:17 p.m. EST

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13
14 VIDEOTAPED DEPOSITION OF MARK COPA

15 TAKEN VIA ZOOM TELECONFERENCE

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18 Taken on behalf of the Plaintiffs before
19 Alice J. Teslicko, Registered Professional Reporter,
20 Registered Merit Reporter and Notary Public, pursuant to
21 Plaintiffs' Notice of Deposition in the above cause.
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25

1 product configurations is probably the right way to
2 say that.

3 Q Can you look at the folder marked Tab 13,
4 and let's introduce that as Exhibit 258.

5 A Okay.

6 (Whereupon a document/item was marked for
7 identification as Plaintiffs' Exhibit 258.)

8 Q This is an email forwarded to you from Scott
9 Saunders on August 21, 2015; is that right?

10 A Yes. August 21st, 2015, yes.

11 Q And he's forwarding to you a string between
12 himself and Mr. Saunders and Ken Sullivan; is that
13 right?

14 A That's right.

15 Q And what was Ken Sullivan's role at that
16 time?

17 A Gosh, I think Ken Sullivan at that time was
18 our CFO, I think.

19 Q And the subject of the email is "Update; is
20 that right"?

21 A Yeah, yes.

22 Q Looking at the first email in time from
23 Mr. Saunders to Mr. Sullivan on August 21st, 2015, the
24 first bullet point of his email reads:

25 "Agri Stats: My goal was to change up the

1 way we attack the Agri Stats meetings. Certainly the
2 participation level and the interaction level was much
3 better than the last (first one) that I attended).
4 The green book, which is the ops group, mostly still
5 has a ways to go. I have challenged them to come up
6 with the top five things they can tackle to improve
7 profitability. Then we will measure those five and
8 review constantly.

9 "The red book, which is sales, was much more
10 interactive this time. The business managers each
11 took their pages and were very frank about their
12 performance in each area. Again, I had challenged
13 them to create the top five areas they need to improve
14 to move us up the rankings.

15 "We also had a discussion about the fact
16 that we are \$20 per head behind JBS and that we need
17 to develop plans to get at the difference."

18 Do you see that?

19 A Yes.

20 Q And then following that in bold is: "Good,
21 I like the simplicity of 'five things.'" Do you see
22 that?

23 A Yes.

24 Q Does it appear that the "good, I like the
25 simplicity of five things" in bold is what

CERTIFICATE OF OATH

I, Alice J. Teslicko, RMR, a Notary Public
for the State of Florida at large, do hereby
certify that the witness, Mark Copa, appeared via
teleconference before me and was duly sworn.

Signed and sealed this 10th day of February,
2022.



Alice J. Teslicko, RMR

Commission No. GG249076

My Commission Expires:

December 14, 2022